



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

July 19, 2023

By ECF

The Honorable Lorna G. Schofield
United States District Judge
United States Courthouse
40 Foley Street
New York, NY 10007

Application Granted. The Clerk of the Court is directed to terminate the letter motion at docket number 51.

Dated: July 20, 2023
New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *United States v. Cicero Williams, 22 Cr. 571 (LGS)*

Dear Judge Schofield:

The Government submits this letter, with the consent of the United States Probation Office (“Probation”), to respectfully request that certain internal chronology reports maintained by Probation detailing Probation Officer Michael Nicholson’s supervision of the defendant be released to the Government.

As the Court is aware, trial in this case is scheduled to start on August 9, 2023. At trial, the Government intends to call Probation Officer Nicholson to testify. Accordingly, the Government respectfully moves for the release of internal chronology reports maintained by Probation regarding the following: (1) an index documenting all instances that Probation Officer Nicholson has seen the defendant or his son—whether in-person or virtually—since August 2019, when Probation Officer Nicholson began to supervise the defendant; (2) visits by Probation Officer Nicholson to the defendant’s residence; (3) the self-reported residence of the defendant; (4) individuals who lived with the defendant in 2022.

The Government understands that this order is necessary before Probation can share its records with the United States Attorney’s Office.

Respectfully submitted,

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by:

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